

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

<p>In re: INTEGRATED HEALTH SERVICES, INC., <i>et al.</i>,  Debtors.</p>	<p>Chapter 11 Case No. 00-389 (MFW) (Jointly Administered)</p>
<p>IHS LIQUIDATING LLC,  Plaintiff,  v.  ACE INDEMNITY INSURANCE COMPANY f/k/a INDEMNITY INSURANCE COMPANY OF NORTH AMERICA,  Defendant.</p>	<p>Civil Action No. 05-376 (GMS)</p>
<p>IHS LIQUIDATING LLC,  Third-Party Plaintiff,  v.  NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, GENERAL STAR INDEMNITY COMPANY, and ACE INDEMNITY INSURANCE COMPANY f/k/a INDEMNITY INSURANCE COMPANY OF NORTH AMERICA,  Third-Party Defendants.</p>	
<p>ACE INDEMNITY INSURANCE COMPANY f/k/a INDEMNITY INSURANCE COMPANY OF NORTH AMERICA,  Third-Party Defendant and Fourth-Party Plaintiff,  v.  NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, and GENERAL STAR INDEMNITY COMPANY,  Fourth-Party Defendants.</p>	

**NOTICE OF DEPOSITION**

TO: Francis J. Deasey, Esq.  
Deasey, Mahoney & Bender, Ltd.  
1800 John F. Kennedy Boulevard  
Suite 1300  
Philadelphia, PA 19103-2978

Benjamin C. Wetzel, III, Esq.  
1100 North Grant Avenue  
Suite 201  
Wilmington, DE 19805

PLEASE TAKE NOTICE THAT third-party defendant/fourth-party defendant, National Union Fire Insurance Co. of Pittsburgh, PA, (National Union), will take the deposition of the defendant/third-party defendant/fourth-party plaintiff ACE Indemnity Insurance Company f/k/a Indemnity Insurance Company of North America (IICNA), pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure at 10 a.m., April 18, 2007, at the offices of Cohen, Seglias, Pallas, Greehall & Furman, P.C. 30 South 17<sup>th</sup> Street, Philadelphia, PA, 19103, before a notary or other competent authority authorized to administer oaths. The examination shall continue from day to day until completed. The testimony shall be recorded by stenographic means.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, IICNA shall designate one or more of its officers, directors, or managing agents, or such other persons who consent to testify on its behalf, to testify about the following matters:

1. IICNA's receipt, investigation, handling, adjustment and disposition of liability claims made against Integrated Health Services, Inc., and against Integrated Health Services of Lester, Inc.;

2. The investigation and formation of, and bases for, IICNA's claim that the policy of insurance issued by National Union to Integrated Health Services, covering the period from January 1, 1999, to January 1, 2000, is not properly exhausted;

3. The investigation and formation of, and bases for, IICNA's claim that the policy of insurance issued by National Union to Integrated Health Services, covering the period from January 1, 2000, to January 1, 2002, is not properly exhausted;

4. The underwriting of the policy of insurance issued by IICNA to Integrated Health Services Inc., for the period from January 1, 1999, to January 1, 2000;

5. The underwriting of the policy of insurance issued by IICNA to Integrated Health Services Inc., for the period from January 1, 2000, to January 1, 2001;

6. IICNA's receipt, access to, review, auditing, maintenance, storage, and/or destruction of original files reflecting the handling of liability claims against Integrated Health Services, Inc., and against Integrated Health Services of Lester, Inc.

Dated: April 12, 2007  
Wilmington, Delaware

CROSS & SIMON, LLC

By: /s/ Christopher P. Simon

Christopher P. Simon (No. 3697)  
913 North Market Street, 11<sup>th</sup> Floor  
Wilmington, Delaware 19899-1380  
(302) 777-4200  
(302) 777-4224 (Facsimile)

-and-

Gwynne A. Young, Esq.  
Carlton Fields, LLP  
Corporate Center Three at International Plaza  
4221 W. Boy Scout Boulevard  
Tampa, FL 33607-5736  
(813) 229-4333  
(813) 229-4133 (Facsimile)

-and-

George G. Campion, Esquire  
WEINER LESNIAK, LLP  
629 Parsippany Road  
Parsippany, New Jersey 07054-0438  
(973) 403-1100  
(973) 403-0010 (Facsimile)

***Counsel for National Union Fire  
Insurance Company of Pittsburgh, PA***